

BEFORE THE
PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

PUBLIC UTILITIES
COMMISSION

2009 JAN 15 P 4: 14

FILED

In the Matter of the Application of)
HAWAIIAN ELECTRIC COMPANY, INC.)
For Approval of Rate Increases and)
Revised Rate Schedules and Rules)

DOCKET NO. 2008-0083

DEPARTMENT OF DEFENSE'S FOURTH
SUBMISSION OF INFORMATION REQUESTS.

AND

CERTIFICATE OF SERVICE

RICHARD CARLILE
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ATTORNEYS FOR
DEPARTMENT OF DEFENSE

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

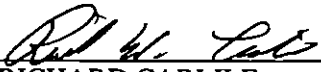
In the Matter of the Application of)
HAWAIIAN ELECTRIC COMPANY, INC.)
For Approval of Rate Increases and)
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DEPARTMENT OF DEFENSE'S FOURTH
SUBMISSION OF INFORMATION REQUESTS
TO HAWAIIAN ELECTRIC COMPANY, INC.

COMES NOW, DEPARTMENT OF DEFENSE by and through its undersigned attorney and
hereby submits its Fourth Submission of Information Requests to Hawaiian Electric Company, Inc.

DATED: Honolulu, Hawaii, January 15, 2009.



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DEPARTMENT OF DEFENSE'S FOURTH
SUBMISSION OF INFORMATION REQUESTS
TO HAWAIIAN ELECTRIC COMPANY, INC.
INSTRUCTIONS

In order to expedite and facilitate Department of Defense's review and analysis in the above matter, the following is requested:

1. For each response, HECO should identify the person who is responsible for preparing the response as well as the witness who will be responsible for sponsoring the response should there be an evidentiary hearing;
2. Unless otherwise specifically requested, for applicable schedules or workpapers, HECO should provide hard copies of each schedule or workpaper together with one copy of each such schedule or workpaper on electronic media in a mutually agreeable format (e.g., Excel and Quattro Pro, to name two examples); and
3. When an information request makes reference to specific documentation used by HECO to support its response, it is not intended that the response be limited to just the specific document referenced in the request. The response should include any non-privileged memoranda, internal or external studies, assumptions, HECO instructions, or any other relevant authoritative source which HECO used.
4. Should HECO claim that any information is not discoverable for any reason:
 - a. State all claimed privileges and objections to disclosure;
 - b. State all facts and reasons supporting each claimed privilege and objection;
 - c. State under what conditions HECO is willing to permit disclosure to Department of Defense (e.g., protective agreement, review at business offices, etc.); and

- d. If HECO claims that a written document or electronic file is not discoverable, besides complying with subparagraphs 4(a-c), identify each document or electronic file, or portions thereof, that HECO claims are privileged or will not be disclosed, including the title or subject matter, the date, the author(s) and the addressee(s).
5. Please provide each response in electronic format (if available) as well as paper. Please provide two paper copies of each response, with one copy going directly via overnight delivery to DOD at the following address:

Dr. Khojasteh Davoodi
NAVFAC HQ ACQ-URASO
1322 Patterson Avenue, S.E., Suite 1000
Washington Navy Yard
Washington, D.C. 20374-5065
E-mail: Khojasteh.Davoodi@navy.mil
Ph. (202) 685-3319
Fax: (202) 433-7159

and one copy going directly via overnight delivery to DOD's consultant at the following address:

Ralph Smith
Larkin & Associates
15728 Farmington Road
Livonia, MI 48154
Email: RSmithLA@aol.com
Ph. (734) 522-3420
Fax: 734-522-1410

Please also provide responses in electronic format to Dr. Davoodi and Larkin & Associates at the e-mail addresses above, and to Mr. Richard Carlile at richard.carlile@navy.mil.

DEPARTMENT OF DEFENSE'S
FOURTH SUBMISSION OF INFORMATION REQUESTS
TO HAWAIIAN ELECTRIC COMPANY, INC.

DOCKET NO. 2008-0083

The following information requests are directed to HECO:

DOD-IR-93. (a) Please list, by department and job position/job title, all actual filled positions at HECO as of 12/31/08.

(b) Please list, by department and by job position/title all positions that were unfilled as of 12/31/08, for which HECO is requesting cost be included in the 2009 test year.

(c) For each position listed in response to part b, please provide the following information:

(1) anticipated hiring date;

(2) anticipated annual salary and benefits;

(3) amount of labor cost that HECO has reflected in the 2009 test year by account; and

(4) an explanation of whether and why the labor cost that HECO has reflected in the 2009 test year for each position is based on annualized labor cost, pro rated labor cost (e.g., based on the anticipated date of hire through 12/31/09), or some other method.

DOD-IR-94. (a) Please update each HECO rate base schedule to reflect actual 12/31/08 amounts as the starting amounts for the 2009 test year.

(b) Please also identify, quantify and explain each change to 2009 projections affecting rate base accounts.

DOD-IR-95. Provide a detailed trial balance showing the amount in each account and sub-account as of 12/31/08.

DOD-IR-96. (a) Please identify, by amount and account, all consultant costs that HECO has included in 2009 expenses.

(b) For each item identified in response to part a, please also provide the following information:

(1) a copy of the related contract,

(2) an explanation of the scope of work,

(3) the total anticipated charges by calendar year,

(4) a description of any amortization period proposed by HECO;

(5) a description of whether and how the consulting services provide any benefits to HECO's affiliates; and

(6) calculations showing the allocation of such costs between HECO and its affiliates.

DOD-IR-97. (a) Please identify, by amount and account, all legal costs that HECO has included in 2009 expenses.

(b) For each item identified in response to part a, please also provide the following information:

- (1) a copy of the related contract,
- (2) an explanation of the scope of work,
- (3) the total anticipated charges by calendar year,
- (4) a description of any amortization period proposed by HECO;
- (5) a description of whether and how the consulting services provide any benefits to HECO's affiliates; and
- (6) calculations showing the allocation of such costs between HECO and its affiliates.

DOD-IR-98. Please identify, quantify and explain all difficulties in filling budgeted positions that HECO experienced during 2008.

DOD-IR-99. (a) Please identify all 2008 budgeted positions, by department and job position/job title, that were unfilled by HECO for some portion of 2008.

(b) For each position identified in response to part a, please identify the specific dates in 2008 when the budgeted position was unfilled.

DOD-IR-100. To the extent not already provided, please provide Excel files for all exhibits and workpapers, with calculations intact, used in, or relied upon as support for, HECO's Update Filings.

DOD-IR-101. Please provide a monthly listing of all amounts, by account, recorded by HECO in 2008 related to the Pension Tracker.

DOD-IR-102. Refer to HECO T-8 and the related update.

(a) Please identify all cost savings and efficiency benefits related to HECO's proposed Advanced Metering Infrastructure Program.

(b) Please identify, quantify and explain exactly how HECO has reflected each component of cost savings and efficiency improvement related to AMI in its updated filing.

(c) Please identify all costs, by account, related to AMI that are reflected in HECO's updated filing.

(d) Please identify each U.S. electric utility of which HECO is aware that has deployed similar AMI.

(e) Please provide the documents in HECO's possession related to its response to part d.

(f) Please identify, quantify and describe in detail how HECO's meter reading work force would be impacted by AMI deployment.

DOD-IR-103. (a) Please identify and explain each item of Plant Held for Future Use that HECO has included in rate base in its updated filing.

(b) For each PHFFU item identified in response to part a, please provide the following information:

(1) date originally acquired;

(2) cost;

(3) date originally recorded in PHFFU account;

(4) whether the item has ever been recorded in any other account besides PHFFU and, if so, for what periods and what reasons;

(5) HECO's plans for using the item to provide electric utility service.

DOD-IR-104. (a) Please list all modifications to employee benefits that HECO made during 2008.

(b) For each modification identified in response to part a, please identify, quantify and explain its cost impact.

(c) Please list by type of benefit and by sub-account, each employee benefit cost that HECO has included in its updated 2009 test year filing.

DOD-IR-105. Does HECO provide discounted electric service to its employees? If so, please provide full details of this for 2008 and 2009. Please identify all kWh sales that are subject to the discount and identify the amount of revenue foregone in 2008 and, separately, in 2009, related to the provision of discounted electric service.

DOD-IR-106. Does HECO or its affiliates have any studies in the past three years through 2008 of how its provision of employee benefits compares with other utilities and/or other companies? If not, explain fully why not. If so, please identify and provide a copy of all such studies.

DOD-IR-107. (a) Please list all Edison Electric Institute and EEI special purpose activity/EEI sub-group dues that HECO incurred in 2007, 2008 and estimates for 2009.

(b) For each item of EEI and EEI affiliate dues, please provide the related invoices and all correspondence from EEI concerning the purpose of such activities, including identification of the portion of such dues that are related to non-deductible and/or lobbying activities.

(c) Please show in detail how HECO accounted for the EEI basic dues and the dues for each EEI sub-group.

(d) Are the EEI core dues and EEI sub-group dues allocated between HECO and other affiliates? If not, explain fully why not. If so, please show in detail how the allocation was performed for all dues in 2007 and 2008 and as budgeted for 2009.

(e) Does HECO have any information on EEI budget categories or on what activities the EEI funds are spent? If not, explain fully why not. If so, please provide all such information that HECO has for 2007, 2008 and 2009.

(f) Does HECO have any NARUC-sponsored audit reports of EEI dues? If not, explain fully why not. If so, please identify which EEI audit reports HECO has.

CERTIFICATE OF SERVICE

I hereby certify that one copy of the foregoing document was duly served upon the following parties, by personal service, hand-delivery, and/or U.S. mail, postage prepaid, and properly addressed pursuant to HAR sec. 6-61-21(d).

Ms. Catherine P. Awakuni
Executive Director
Division of Consumer Advocacy
Department of Commerce and Consumer Affairs
P. O. Box 541
Honolulu, HI 96809

2 Copies

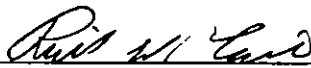
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Counsel for Hawaiian Electric Company, Inc.

DATED: January 15, 2008, Honolulu, Hawaii



RICHARD CARLILE
Associate Counsel
Naval Facilities Engineering Command,
Pacific